WORSHIPFUL COMPANY OF WATER CONSERVATORS

Promoting a diverse and sustainable environment

RESPONSE TO THE DEFRA CONSULTATION ON REGULATORY REFORM FOR FERTILISERS MAY 2026

PROLOGUE

1 The Worshipful Company of Water Conservators (WCWC) is a City of London Livery Company focussed on the long-term health of our water resources and the broader related industries and their regulators, along with others who share our concern for water and the environment. Our experience and knowledge ranges from the complexities of environmental sciences, through the application of engineering to deliver the goals identified by those sciences, and the subsequent management of assets created. The WCWC's purpose is *promoting a diverse and sustainable environment.*

2 As part of that purpose, the WCWC has been responding to relevant Consultations particularly on matters relating to water conservation. These are archived on its website. It has been active in offering views and responding to regulatory consultations on the use of treated sewage sludge (known commonly as biosolids) in agriculture.

https://waterconservators.org/wp-content/uploads/filr/4346/MAR-2026-BIORESOURCES-Response-to-Defra-fin2.pdf

https://waterconservators.org/wp-content/uploads/filr/4364/MAR-2026-BIORESOURCES-Response-to-Defra-Supp3.pdf

https://waterconservators.org/wp-content/uploads/filr/4368/MAR-2026-BIORESOURCES-WG-Response.pdf

3 It has done so not only because of its care for the wider environment, but because it recognises that the costs of managing sewage sludge are a significant proportion of the cost of sewage treatment and it is essential that the option of recycling to agricultural land is able to continue successfully.

THE PROPOSALS

4 The United Kingdom (UK) government, Scottish Government, Welsh Government and the Northern Ireland Executive (referred to collectively as 'all four governments') have worked together on a consultation and call for evidence, which focuses on proposals to repeal existing fertilisers legislation and replace it with a new regulatory framework (the

'UK Fertilising Product Regulations' ("UK FPR")) for placing fertilising products on the market in the UK.

5 The consultation states that *reform of UK fertilisers legislation aims to support innovation in the fertiliser sector, by smoothing the route to market for newer and novel fertilising products which are less polluting to the environment or are less resource intensive in their creation. As well as increasing user confidence in a more diverse range of safe and effective fertilising products.*

6 To assist readers of this response outside of Defra, AI summaries of the consultation are given in Appendix 1 and in Appendix 2.

UK fertilisers: regulatory reform - Defra - Citizen Space

The current 1991 Fertiliser Regulations define what is a Fertiliser (and do not contain biosolids).

https://www.legislation.gov.uk/uksi/1991/2197/schedule/1/made

SUMMARY

7 The WCWC notes the proposed changes to the regulation of inorganic fertilisers. It offers no commentary.

8 The current Regulations include some biowastes, and only then if they are offered as marketable products. And they do not include biosolids in any form. It notes that there is a possibility of extending the Framework to include more biowastes including biosolids. The water industry does not provide for biosolids as marketable products, in the sense of the Regulations now, and is unlikely to do so in future. Like the Government, it awaits the accumulation of evidence, but from the content and intent of the Framework, it suggests that, in general ,adding biosolids to the Framework will add no benefit to practical operational services to agriculture or provide any further protection of crops, soils and customers beyond that envisaged in the current review of biosolids regulations.

9 However, with the innovation envisaged in the Consultation, circumstances may change. For example biochar produced from sewage sludge and used in agriculture will still be deemed biosolids and subject to reformed Regulations, but may lend itself more easily to marketing as a product .In such circumstances if these materials are designated as products under the Framework and dealt with the same as all other products , then the reformed Regulations on biosolids use should exclude them subject to regulation under the Framework and equally the Framework should be explicit in excluding direct services to agriculture for such materials. This principle of mutual exclusivity could apply to other biowastes, such as farmyard manures.

10 If inorganic fertilisers are produced from sewage, sewage sludge and its liquors, such as struvite, they are not biowastes per se, and these should be covered equally by the Framework.

11 The WCWC repeats its suggestions for much better coordination of policy and a particular point on syntax. It agrees with the thrust of the Consultation that more clarity is needed, it is not sure that the hints on the direction of travel with respect to biowastes will provide that.

WCWC RESPONSE

12 The WCWC response draws on many decades of experience of its members in environmental regulation and the management of schemes providing biosolids to agriculture. It focusses in this response on the issue of biowastes.

Background

13 The Consultation rightly points out that the uses of organic materials are a very useful source of nutrients and contribute to recycling and climate change mitigation. It states that the majority of organic material used as fertiliser comes from domestic livestock production. In 2023, 83 million tonnes (MT) of livestock manure from cattle, pigs, sheep and poultry was applied to agricultural land in Great Britain (BSFP). Other organic materials include compost, anaerobic digestate and biosolids and in 2023, 8 million tonnes of non-farm organic materials were applied to agricultural land in Great Britain (BSFP). The majority of cattle manure and slurry applications were made to grassland.

14 Soon this will be joined by products from the treatment of domestic food waste. Simpler Recycling Collection (SRC) reforms require mandatory food waste recycling collections (in England only) from all workplaces (except micro-firms) from 31 March 2025, all households from 31 March 2026 and all micro-firms (with less than 10 staff) by 31 March 2027. Food waste is forecast to increase by 100% to 4.8Mt by 2035 and the preferred method for treating food waste is by anaerobic digestion (biogas) and the production of bio-fertilizer.

https://www.gov.uk/guidance/simpler-recycling-household-recycling-in-england

15 In referring to organic wastes, the Consultation raises issues which will be dealt with in later phases of implementation of the Framework. It does so with sufficient detail to merit commentary now. It would have been helpful at this stage to distinguish between precision products such as prepared inorganic fertilisers, and organic materials which are primarily soil conditioners with fertilising benefits, in which the prescription of nutrient content is less precise.

16 As the consultation recognises these latter materials are regulated in different ways to address other environmental issues such as run off, smell and so on.

https://www.gov.uk/guidance/rules-for-farmers-and-land-managers

Much of this is encapsulated in the so-called Farming Rules for Water

https://ceresrural.co.uk/insights/defra-tightens-autumn-muck-spreading-rules/

17 The evolution of factory farming means that in reality, the waste from sources such as mega chicken farms is industrial waste with concomitant regulation.

https://riveractionuk.com/news/high-court-ruling-declares-farming-manure-as-waste-in-major-victory-for-river-action-in-its-fight-against-industrial-scale-poultry-production-in-wye-valley/

18 And the uses of biosolids have a unique, more extensive set of rules undergoing consideration for extension in England and Wales (see earlier links to consultations). This is discussed more extensively below.

19 Some biowaste products can make the transition from soil conditioner to prescribed fertiliser, pelletise chicken manure being a good example, but not biosolids.

https://www.rhs.org.uk/soil-composts-mulches/chicken-manure

Biosolids

20 The WCWC is very much aware that the regulation of treated sewage sludge provides an extensive control framework, currently under review for reform. The success of the past use of biosolids has rested as much in the soil conditioning properties of biosolids, as in the value of the nutrients contained therein. Operational practices have evolved to meet farmers needs and reflect environmental concerns and that has resulted in less liquid biosolids (digestates), more dewatered, products being provided. This has meant a shift towards longer term nutrient availability; immediately available nutrients, such as ammonia, are reduced in dewatering.

21 Even though this evolution has meant more 'productification', there has been resistance to the products being defined as Fertilizers under current regulations because the products could not meet the strict definition for marketing , although there is sufficient information to help farmers, there is already extensive controls on the uses of products (which are undergoing extension) the additional administration would not add any benefits for farming, or the environment and the biosolids regulations require use and post use monitoring which would be impossible to implement other than through macro supplies to farmers. So, there is no operational benefit. This decision was taken a long time ago but was reflected in the exclusion of biosolids from the 1991 Regulations.

22 However with the innovation envisaged in the Consultation, circumstances may change. For example, biochar produced from sewage sludge and used in agriculture will still be deemed biosolids and subject to reformed regulations yet may lend itself more easily to marketing as a product.

https://campaign.veoliawatertechnologies.co.uk/phosphorus-removal?_gl=1*26oamk*_gcl_au*MTQ3MTAxMDg0Mi4xNzc4NDk2MzMy

23 In such circumstances if these materials are designated as products under the Framework, then the reformed Regulations on biosolids use should exclude them subject to regulation under the Framework and dealt with the same as other products and equally the Framework should be explicit in excluding direct services to agriculture for such materials This principle of mutual exclusivity could apply to other biowastes such as farm- yard manures.

24 However, if inorganic fertilisers are produced from sewage, sewage sludge and its liquors, such as struvite, they are not biowastes per se, and these should be covered equally by whatever emerges for the Framework.

https://campaign.veoliawatertechnologies.co.uk/phosphorus-removal?_gl=1*26oamk*_gcl_au*MTQ3MTAxMDg0Mi4xNzc4NDk2MzMy

Some overall remarks on national policy

25 Once more the WCWC observes that regulatory initiatives from government need better co-ordination. Although the Consultation promises that the issue of biowastes will be dealt with in further phases of reform, there is sufficient in this Consultation to warrant some comment now.

26 The first is that as the WCWC has observed so many times, the syntax needs better attention. What is the scope of biowaste? The consultation on the uses of treated sewage sludges in agriculture included septic tank contents. What is the understanding of this consultation on the definition of biosolids?

27 In particular, more precision is needed on the definition of Fertiliser. Unfortunately, even government has been imprecise in the use of the terms 'fertiliser' and Fertiliser. In the broadest sense 'fertiliser' is used colloquially for any material containing nutrients, whilst the term 'Fertiliser' is for products covered by current 1991 regulations. So the guidance on the application of biowastes to agricultural land as part of overall guidance on the application of fertilisers, uses it in the colloquial sense, but that for marketed manufactured inorganic products refers to Fertilisers prescribed under the 1991 Fertiliser Regulations (there is a bit of obscurity on certain manufactured organic products prescribed in the Regulations). In hindsight, the water companies have also been less than precise in the use of the terminology.

https://www.gov.uk/guidance/using-nitrogen-fertilisers-in-nitrate-vulnerable-zones
https://www.nutri-bio.co.uk/products

28 Second, the WCWC understands that this is about the supply of products in the marketplace and therefore will exclude framers using in situ farm wastes as fertilisers.

29 Third, there is a practical need to bring together all of the relevant regulatory pieces, which fit together. In its responses to the consultations on the uses of treated sewage sludge, the WCWC advocated an overarching national strategy for bioresources and a single national focus. The responses identified several pieces of relevant legislation not

referred to in this consultation (presumably these will be referred to in further phases of Consultation).

30 The overlap of any future initiative on biowastes as fertilisers, whenever it comes, must fit in with whatever emerges for the consultation on the reform of regulation of uses of treated sewage sludge in agriculture; the WCWC asks if there will be an exclusion in the Fertiliser Framework for whatever emerges from any reforms? What about other uses of treated sewage sludges on other kinds of land?

31 As a further example of the span of relevant government policies, the UK government supports schemes for AD biomethane, such as the Green Gas Support Scheme and the Department for Energy Security and Net Zero (DESNZ)'s upcoming future biomethane policy framework. DESNZ intend to consult on its future biomethane framework by Spring 2026, including on measures to ensure digestate is being managed appropriately to mitigate environmental impacts.

APPENDIX 1

Key Regulatory Proposals: UK Fertilising Product Regulations (UK FPR)

1. Creation of a Harmonised Regulatory Framework (UK FPR)

- **Objective:** Replace the fragmented and outdated fertiliser legislation with a single, harmonised framework for placing fertilising products on the UK market.
- **Scope:** Applies across England, Scotland, Wales, and Northern Ireland, mitigating risks of regulatory divergence and supporting market access and innovation.
- **Alignment:** The UK FPR will be similar to the EU Fertilising Product Regulations (EU FPR) but tailored to UK needs. This will facilitate trade and regulatory predictability.

2. Adoption of a Conformity Assessment System

- **Mechanism:** Products must undergo conformity assessment to demonstrate compliance with regulatory requirements before being placed on the market.
- **Modules:** Different modules (A, A1, B+C) are proposed, ranging from self-declaration to third-party assessment, depending on product risk.
- **UKCA Mark:** Products that pass conformity assessment will bear the UKCA mark, signifying compliance.

3. Phased Implementation and Product Prioritisation

- **Initial Focus:** The first stage will prioritise conformity assessment for products with well-understood risks and benefits:
    - Inorganic fertilisers (macronutrient and micronutrient)
    - Liming materials
    - Nitrification and urease inhibitors
    - Blends of the above
    - Only products made from virgin material substances and mixtures (CMC 1)
- **Future Expansion:** Novel products (e.g., plant biostimulants, organo-mineral fertilisers, products from waste) will be considered in later phases as evidence and standards develop.

4. Technical and Labelling Requirements

- **General Requirements:** All fertilising products must meet baseline safety, quality, and labelling standards.
- **Product-Specific Requirements:** UKCA-marked products must meet additional requirements based on their function and composition (e.g., nutrient content, contaminant limits, efficacy for inhibitors).
- **Labelling:** Consistent, clear labelling is required for all products, with digital labelling permitted alongside physical labels.

5. Market Surveillance and Enforcement

- **Enforcement:** Local authorities (Trading Standards) and DAERA (NI) will enforce the new regulations, with updated powers for sampling, analysis, and corrective actions.
- **Penalties:** Non-compliance may result in fines, product recalls, or criminal sanctions.

6. Support for Innovation and Circular Economy

- **Encouragement of New Technologies:** The framework is designed to be flexible, supporting the introduction of innovative products and nutrient recovery from waste as evidence and standards mature.
- **Stakeholder Engagement:** Ongoing technical workshops and calls for evidence will inform future regulatory updates, especially for novel products.

7. Transition and Stakeholder Involvement

- **Transition Period:** A two-year transition is proposed from the date the new legislation comes into force.
- **Consultation:** Stakeholders are invited to participate in technical workshops and provide evidence to shape detailed requirements.

Example Implementation

- **For Manufacturers:** Before placing a new inorganic fertiliser on the market, the manufacturer must ensure it meets the technical and labelling requirements, undergo conformity assessment (Module A), and affix the UKCA mark.
- **For Importers:** Must verify that imported products have passed conformity assessment and are properly labelled before sale in the UK.
- **For Enforcement:** Trading Standards can sample products, check documentation, and issue compliance or recall notices if products do not meet requirements.

Summary Table: Key Proposals and Their Purpose

Proposal	Purpose
Harmonised UK FPR	Simplify, unify, and modernise fertiliser regulation
Conformity Assessment	Ensure product safety, quality, and environmental protection
UKCA Mark	Signal compliance to users and authorities
Phased Product Scope	Focus on well-understood products first, expand as evidence grows
Technical/Labelling Standards	Protect users and environment, support informed choices
Market Surveillance	Enforce compliance, manage risks
Support for Innovation	Enable new, sustainable products and nutrient recycling
Stakeholder Engagement	Ensure regulations are practical and evidence-based

This summary provides a clear, actionable overview of the key regulatory proposals for UK fertilisers as outlined in the 2026 consultation document.

APPENDIX 2

Summarize key regulatory proposals

Reasoning and Approach

To provide a clear and actionable summary, the executive summary and key sections of the UK government's 2026 consultation document on fertiliser regulatory reform are reviewed. The summary below distils the main regulatory proposals, their rationale, and the mechanisms by which they will be implemented. This is designed for stakeholders such as manufacturers, importers, distributors, enforcement authorities, and end-users who need a concise overview of the proposed changes and their implications.
This document outlines proposed reforms to the UK fertilisers regulatory framework to enh ance safety, environmental sustainability, and market resilience.

Development of UK Fertilising Product Regulations

- The UK plans to replace existing fertiliser laws with a harmonised, risk-based conformity assessment framework similar to EU FPR.
- The new regime aims to support market resilience, environmental protection, and in ternational trade, with phased implementation for newer products.

Current UK Fertilisers Legislation and Scope

- UK legislation covers supply, labelling, and safety of inorganic fertilisers, inhibitors, a nd certain organic materials, excluding use and application.
- Regulations differentiate between inorganic products, organic fertilisers, and novel p roducts, with specific requirements for ammonium nitrate and animal by-products.

Environmental and Market Challenges

- Market volatility caused by global conflicts and natural gas prices impacts fertiliser su pply and prices.
- The legislative framework aims to enhance supply resilience, promote efficient nutri ent use, and support a circular economy through nutrient recovery.

Environmental and Health Risks

- Fertiliser production and use pose risks to air, water, soil, and human health.
- Current regulations focus mainly on nutrient levels, with limited controls on contami nants and emerging products, necessitating updated, comprehensive standards.

Environmental Impact of Ammonia Emissions

- Ammonia released into the air harms sensitive plants, causes soil acidification, and di srupts plant species balance. It also reacts with atmospheric chemicals to form PM2. 5, affecting human health.
- In the UK, 87% of ammonia emissions originate from agriculture, mainly livestock ma nure and urine, with inorganic fertiliser application contributing 15% in 2023.

Policies and Standards for Ammonia Reduction

- Industry-led ‘Red Tractor urea standard’ restricts uninhibited urea use to winter months and p romotes urease inhibitors outside this period to minimise emissions.
- Research is ongoing to develop similar standards for urease inhibitors in Scotland an d Northern Ireland.

Agriculture’s Role in Water Pollution and Eutrophication

- Agriculture accounts for around 40% of river and groundwater pollution due to exces s nitrogen and phosphorus, leading to eutrophication and aquatic ecosystem decline.

Greenhouse Gas Emissions from Fertiliser Production

- Fertiliser manufacturing contributes 37% of global life cycle GHG emissions, with 69 % of UK air pollution from nitrous oxide mainly from soil application of manure and i norganic fertilisers.
- Policies promote nitrification inhibitors and biostimulants to reduce emissions.

Innovation in Fertiliser Technologies

- Focus on green ammonia, biostimulants, inhibitors, and controlled-release fertilisers to improve efficiency and reduce environmental impact.
- Research into novel fertilisers from waste, such as digestate, aims to enhance sustain ability but faces cost and environmental impact uncertainties.

Contaminants and Risks in Fertilisers

- Fertilisers may contain toxic elements like cadmium, chromium, and lead, which can accumulate in soil and enter the food chain.
- Defra's research indicates risks are low when following regulations, but vigilance is n eeded due to emerging contaminants and modelling uncertainties.

UK Fertilisers Legislation Reform Rationale

- Current regulations are outdated, fragmented, and lack specific standards for new fe rtiliser types. A new flexible, harmonised UK FPR aims to simplify compliance, suppor t innovation, and improve safety.
- The reform emphasizes a risk-based, conformity assessment approach, with a focus on product safety, environmen tal standards, and trade facilitation.

Conformity Assessment Framework

- UK FPR proposes a conformity assessment system using UKCA marks to demonstrate compliance, aligned with international standards and EU FPR for Northern Ireland.
- It aims to streamline product approval, reduce costs, and enhance market confidenc e through accreditation by UKAS and risk-based procedures.

Product Type and Material Requirements

- Prioritises conformity assessment for high-certainty fertiliser types like inorganic fertilisers and inhibitors.
- Sets technical standards for product functions and input materials, including labelling and safety limits, with staged implementation for complex products like biostimulan ts.

Market Placement and Regulatory Timing

- Defines "placing on the market" as when products are made available for use or tran sfer in the UK.
- Proposes specific border and safety requirements for high nitrogen AN fertilisers, wit h compliance needed before market entry.

Recognition of EU Certification

- Considers recognition of EU CE marks for certain fertilisers to facilitate trade and red uce duplication.
- Benefits include market access continuity and reduced costs, especially for products assessed under EU FPR.

Conformity Assessment Modules Overview

- Four modules (A, A1, B+C, D1) vary in complexity and CAB involvement, from manufacturer-led checks to rigorous ongoing audits.
- Modules are designed to handle different risk levels and product types, with detailed descriptions provided for initial implementation.

Module A and A1 Conformity Procedures

- Module A relies on internal control, with manufacturers producing technical documentation and testing samples in accredited labs.
- Module A1 adds mandatory supervised testing, with approved bodies overseeing ongoing testing and certification, including sign-off and responsibility declarations.

Modules B+C Type Examination and Production Control

- Module B involves approved bodies examining product design, issuing certificates after testing and document review.
- Module C requires manufacturers to maintain conformity through internal controls, affixing UKCA marks, and signing declarations of responsibility.

Module D1 Quality System Certification

- Focuses on manufacturers operating approved quality systems with ongoing surveillance by approved bodies.
- Includes site audits, sample testing, and documentation review, with responsibilities for corrective actions and continuous compliance.

Presumption of Conformity and Standards

- Designated standards confer a rebuttable presumption of conformity, reducing testing burdens if standards are met.
- UK may adopt European standards from CEN/CENELEC, with standards designated fully, partially, or not at all, influencing conformity assumptions.

Declaration of Conformity Requirements

- Manufacturers must prepare a detailed Declaration of Conformity before market placement, including product info, responsible parties, and compliance statements.
- For blends, component conformity declarations are required; no new blends can be created from existing products.

Obligations of Economic Operators

- Manufacturers, importers, distributors, and authorized representatives have specific duties to ensure product compliance, proper marking, and traceability.
- Responsibilities include technical documentation, immediate corrective actions, and maintaining records for five years.

Conformity Assessment Framework Management

- Defra oversees the framework, with UKAS accrediting conformity assessment bodies (CABs).
- Testing labs must be accredited to ISO/IEC 17025 and located in specified regions, including UK, EU, or trade agreement countries.

Approved Bodies and Accreditation

- Approved bodies are independent CABs accredited to ISO/IEC 17065 or 17020, responsible for conformity assessments under modules.
- Criteria include independence, technical competence, impartiality, and proper management systems, with UKAS accreditation as a prerequisite.

Approval Process and Subcontracting

- Application involves UKAS accreditation, with UK government approval based on compliance and surveillance.

- Approved bodies can subcontract tasks but remain responsible for overall conformit y assessment and must ensure subcontractor competence.

Market Surveillance and Enforcement Powers

- Enforcement remains with local authorities and DAERA initially, with powers for sam pling, inspection, and product restrictions.
- Authorities can issue notices for non-compliance, including suspension, recall, or destruction, with procedures for appeals and urgent actions.

Penalties and Non-Compliance Measures

- Non-compliance includes incorrect UKCA marking, missing documentation, or administrat ive failures.
- Penalties involve fines up to £5,000 under the Agriculture Act, with enforcement acti ons including product seizure and destruction.

Penalties and Enforcement Provisions

- Offences can result in fines up to level 5 or imprisonment up to three months, or bot h.
- A new civil sanction system allows enforcement authorities to impose monetary pen alties via notices, with rights to appeal within 28 days.
- Penalties are paid into the Consolidated Fund, and once imposed, offenders cannot b e criminally convicted for the same offence.

Defence for Non-Compliance

- A defence similar to Section 82 of the Agriculture Act is proposed, allowing proof tha t offences were due to mistakes, reliance on information, acts of others, accidents, o r causes beyond control.
- Offenders must demonstrate all reasonable precautions and due diligence to avoid o ffences.

Technical Regulatory Requirements

- All fertilising products must comply with technical standards for product function cat egories (PFC) and component material categories (CMC).
- Requirements include nutrient expression in oxide form, contaminant limits, and spe cific product descriptions for categories like inorganic fertilisers, liming materials, an d inhibitors.

Product Function and Category Definitions

- Clear descriptions for PFCs such as fertilisers (PFC 1), liming materials (PFC 2), and in hibitors (PFC 5).
- Specific criteria for inorganic fertilisers, including high nitrogen ammonium nitrate ty pes, micronutrients, and organic/inorganic distinctions.

Contaminant Limits and Safety

- Limits are proposed for toxic elements like cadmium, chromium, mercury, and micro bial contaminants.
- These limits aim to prevent long-term soil accumulation and protect the food chain, with technical workshops to set p recise values.

Fertiliser Technical and Nutrient Standards

- Minimum and no upper maximum nutrient levels are proposed to allow tailored appl ications.

- Nutrient content declarations must meet specified minimums, with tolerances to acc ount for manufacturing variations.

Product Certification and Conformity

- Conformity assessment modules (A, A1, B+C) are proposed for different product type s, involving manufacturer self-assessment or third-party verification.
- For high nitrogen ammonium nitrate fertilisers, additional safety tests like oil retenti on and detonation resistance are required.

Labelling and Digital Information

- All products must have clear physical labels with manufacturer details, batch info, an d safety instructions.
- Digital labelling options are proposed, requiring key information to be accessible onli ne or via QR codes, with a 10-year accessibility period.

Import and Supply Chain Regulations

- Importers must ensure products are UKCA marked, accompanied by safety certificat es, and comply with conformity procedures.
- Operators must maintain detailed records for two years, including certificates and ba tch information, and avoid misdescription of products.

Conformity Assessment Procedures

- Modules A, A1, and B+C are outlined for different product categories, emphasizing m anufacturer control, third-party testing, and efficacy verification.
- Accredited laboratories and approved bodies are integral to the assessment process, ensuring safety and compliance before market placement.

Regulatory Framework for Fertiliser Products

- The UK legislation covers primary and secondary laws, including EU regulations, with specific amendments for UK compliance.
- The UK Fertilising Products Regulations 2020 and related EU regulations govern prod uct standards, conformity, and labelling.

Conformity Assessment Modules

- Module A1 involves internal control plus supervised testing for high nitrogen AN ferti lisers, requiring technical documentation, accredited testing, and UKCA marking.
- Modules B+C combine third-
  party type examination and internal control, with certification valid up to 5 years, em phasizing independent testing and ongoing compliance.

Testing Laboratory and Manufacturer Responsibilities

- Accredited laboratories must be ISO/IEC 17025 compliant, with testing supervised by approved bodies.
- Manufacturers are responsible for technical documentation, affixing UKCA marks, sig ning declarations of conformity, and maintaining records for 5 years.

Operational and Information Obligations of Approved Bodies

- Approved bodies must prevent misuse of certificates, notify non-
  conformities promptly, and update authorities on changes affecting conformity.
- They are required to share information on certificates, test results, and product modi fications with authorities and other bodies.

Technical Workshops and Stakeholder Engagement

- Ten workshops are planned to refine standards for PFCs, CMCs, testing procedures, l abelling, sampling, and enforcement.

- Stakeholders are invited to participate, share expertise, and suggest additional topics for technical development.

Future Policy and Market Development

- The UK aims to support innovation, including novel fertilisers and nutrient recovery t echnologies, with a focus on circular economy principles.
- Barriers include regulatory gaps, costs, and technical challenges in producing consist ent organic nutrients and recycled products.

Green Claims and Environmental Impact

- There is concern over vague green claims like 'low-carbon' without clear thresholds, risking misleading consumers.
- Regulation proposals include defining terms, standardising carbon footprint calculati ons, and ensuring transparent communication.

Plant Biostimulants and Novel Products

- The sector faces evidence gaps on efficacy, safety, and environmental impacts of bio stimulants, with ongoing UK research to develop testing standards.
- Usage is variable, with some end-users applying biostimulants alongside other fertilisers, but many cite lack of informa tion or effectiveness concerns.

Alternative Technologies and Nutrient Recycling

- Technologies like composting, anaerobic digestion, and biochar are recognized for cir cular economy benefits but face regulatory and market barriers.
- Expanding legislation scope to organic nutrient products could incentivize use, this requires evidence of nutrient consistency and environmental safety.

Key Regulatory Proposals: UK Fertilising Product Regulations (UK FPR)

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7. Transition and Stakeholder Involvement

- **Transition Period:** A two-year transition is proposed from the date the new legislation comes into force.
- **Consultation:** Stakeholders are invited to participate in technical workshops and provide evidence to shape detailed requirements.

Example Implementation

- **For Manufacturers:** Before placing a new inorganic fertiliser on the market, the manufacturer must ensure it meets the technical and labelling requirements, undergo conformity assessment (Module A), and affix the UKCA mark.
- **For Importers:** Must verify that imported products have passed conformity assessment and are properly labelled before sale in the UK.
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Harmonised UK FPR	Simplify, unify, and modernise fertiliser regulation
Conformity Assessment	Ensure product safety, quality, and environmental protection
UKCA Mark	Signal compliance to users and authorities

Proposal	Purpose
Phased Product Scope	Focus on well-understood products first, expand as evidence grows
Technical/Labelling Standards	Protect users and environment, support informed choices
Market Surveillance	Enforce compliance, manage risks
Support for Innovation	Enable new, sustainable products and nutrient recycling
Stakeholder Engagement	Ensure regulations are practical and evidence-based

This summary provides a clear, actionable overview of the key regulatory proposals for UK fertilisers as outlined in the 2026 consultation document.